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Commissioner

IN THE MATTER OF U S WEST COMMUNICATIONS, INC.'S COMPLIANCE WITH § 271 OF THE TELECOMMUNICATIONS ACT OF 1996	Docket No. T-00000A-97-0238 AT&T'S REPLY ON ITS MOTION TO REOPEN AND SUPPLEMENT THE RECORD ON CHECKLIST ITEM 7 (911)

AT&T Communications of the Mountain States, Inc. and TCG Phoenix (collectively "AT&T"), hereby file their Reply On Their Motion to Reopen and Supplement the Record on Qwest Corporation's (formerly US West) Compliance With Checklist Item Number 7 of Section 271 of the Telecommunications Act of 1996 ("Act"). In support of this Reply, AT&T is filing herewith the Affidavit of Kenneth L. Wilson, dated March 4, 2002 ("Wilson Aff."). AT&T's filings fully support granting AT&T's Motion to Reopen and Supplement the record on Checklist Item 7 at which time Staff should have the opportunity to file a report and the parties should have the opportunity to file comments.

INTRODUCTION

Qwest's Verified Response to AT&T's Motion to Reopen and Supplement the Record on Checklist Item 7 (911) does not reflect the magnitude of the problem nor does it offer a viable solution. Qwest reports only nine phone numbers that Qwest currently has failed to unlock in Arizona when as of February 25, 2002, AT&T's records show

more than 250.[1] Such a significant disparity requires, at the very least, reconciliation. Moreover, AT&T has provided, in exhibits annexed to the Wilson Affidavit, the telephone numbers and dates associated with the more than 250 currently locked numbers as well as more than 1,100 additional numbers that Qwest failed to unlock for more than 14 days in the past year.[2]

Qwest's claim that there are currently only nine locked numbers raises another issue relating to Performance Indicator Definitions ("PID"). Qwest has eliminated consideration of information on 911 database updates for facilities based carriers such as AT&T in the presentation of its data, so that no analysis has been done to determine the scope of this problem. Given the small number of 911 errors reflected in the results for those PIDs related to database accuracy, it is clear that adjustments need to be made to be sure that these PIDs are accurately capturing the 911 problem.[3]

Qwest also claims that much of the 911 unlock problem was caused by a software error that was fixed in May 2000. AT&T did not see a change in the frequency of 911 unlock problems over the past year. Chronic unlock problems are still occurring at the rate of about one hundred per month in Arizona. Qwest also claims that the 911 unlock problem will be fixed by having Intrado clean up the problems caused by Qwest's failure to unlock the 911 database. This solution will be manual, delaying the unlocking of the CLEC's customer's data, is untested, and does not solve the underlying cause of the 911 unlock problem.[4]

Qwest does not deny that quality in processing 911 data is important. Qwest, however, is denying it has a significant problem in sending unlock messages so that

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[1] Wilson Aff. ¶ 10; Exhs. B, C.
[2] Wilson Aff. ¶ 7; Exh. D.
[3] Wilson Aff. ¶ 18.
[4] Wilson Aff. ¶¶ 14-17.

CLECs can update 911 data. AT&T's data proves otherwise and the record on Checklist Item 7 must be reopened so that it includes evidence on this problem. Moreover, it must remain open until the 911 database problem is resolved and the fix verified.

BACKGROUND

Qwest is responsible for unlocking the 911 database when a CLEC migrates a customer from Qwest using local number portability ("LNP"). National standards require that Qwest send the message to unlock the 911 database when the number is ported. Qwest is failing to perform this function for AT&T on the day the number is ported and in many instances is failing to send the message for months. Qwest's conduct puts AT&T's customers in jeopardy. In these situations, AT&T is not able to change its customers' information in the 911 database, causing potentially life-threatening situations because emergency equipment may be sent to the wrong address. In addition, AT&T is spending time and money to correct the problems that Qwest is causing. Each failure to unlock must be individually researched and communicated to Qwest, sometimes multiple times, for correction.

In AT&T's moving papers and the Affidavit of Kenneth L. Wilson, dated February 8, 2002, filed therewith, AT&T stated that it had received reject messages for more than 1,700 numbers during 2001 and that more than 1,000 of those had remained locked for more than three to four months. Although AT&T and Mr. Wilson continue to believe these figures are correct, further investigation reveals that the data on which those figures were based included some double counting.[5] Moreover, a more thorough review of the data shows that AT&T does not maintain a comprehensive accounting of all 911 unlock problems.[6] However, based on the data that is available, AT&T has provided

[5] Wilson Aff. ¶¶ 11, 13.
[6] Wilson Aff. ¶¶ 6, 11.

1,142 numbers that Qwest failed to unlock for more than 14 days during the past year.[7] Of these, more than 750 remained unlocked for more than three to four months.[8] The critical point is that, even using the more conservative figures, the magnitude of the problem is very large.

Even Qwest has admitted that its systems have caused problems in sending the unlock message.

> In addition, in April-May, 2001, Qwest installed an update of IMA. During this update, there was a system error in IMA that prevented certain records from being "unlocked." Upon discovery of this software error, Qwest fixed the problem in May 2001. It then reprocessed any outstanding AT&T orders. [9]

Although Qwest acknowledges the problem, its characterization is troubling for several reasons. First, AT&T has not seen any decrease in unlock problems at any time in the past year. In fact, the AT&T data shows just the opposite, with a very large number of new unlock problems in August of 2001 and thereafter. Second, Qwest says that it reprocessed outstanding AT&T orders after the software "fix" in May. AT&T's actual experience was that after months of requests by AT&T, Qwest finally reprocessed thousands of AT&T numbers in November 2001. AT&T is not aware of any bulk reprocessing before that time. AT&T repeatedly asked Qwest for many months to clean up the unlock problems it was causing. Qwest finally initiated a reconciliation process in October and November of 2001.[10]

Until Qwest admits that the 911 database problem exists today, admits that the problem is severe and corrects the problem, it will not have satisfied Checklist Item 7 of Section 271.

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[7] Wilson Aff. ¶ 7; Exh. D.
[8] *Id.*
[9] Qwest's Verified Response to AT&T's Motion to Reopen and Supplement the Record on Checklist Item 7 (911), page 6.
[10] Wilson Aff. ¶ 7.

DISCUSSION

I. Qwest's Data Severely Understate the 911 Database Problem.

Qwest attempts to minimize the unlock problem by understating the number of customer lines that are being impacted. In its verified response, Qwest goes to great lengths to show that there are only nine numbers that Qwest currently has failed to unlock in Arizona. Qwest claims that its data came from Intrado, but gives no time period. As explained in the Wilson affidavit, AT&T's records show that as of February 25, 2002, AT&T had a total of 264 numbers that had not been unlocked in Arizona, 156 for less than 14 days from the date the number was ported to AT&T and 108 for more than 14 days.[11] AT&T has provided the actual telephone numbers involved in Confidential Exhibits B and C to the Wilson Affidavit.

The distinction between less and more than fourteen days is important because the error code in the reject message that Intrado sends differs depending on whether the number has been unlocked for more than 14 days. If Qwest has failed to unlock the number for less than 14 days, Intrado sends a "755" error code, but if more than 14 days from the date the number was ported have passed, then Intrado sends a "760" error code.[12]

Some of the 156 numbers that had pending 755 error codes as of February 25 will be cleared within the 14 day period for the same reasons that Qwest illustrated in their comments. One example is where AT&T sends the first request to Intrado to change the data a day before Qwest sends the unlock message. However, such problems cannot be the cause of the 108 AT&T numbers in Arizona where Intrado has not received an unlock message for over 14 days. AT&T has not fully investigated either the 156 where Intrado

[11] Wilson Aff. ¶¶ 6-8.
[12] Wilson Aff. ¶ 6.

sent the "755" message or the 108 where AT&T received the "760" message.[13] Yet, it is AT&T's experience that the majority of numbers where AT&T received the "760" error code are due to Qwest's failure to send the unlock.[14] Based on the data that we have for 2001, it appears that 99.5% of the "760" type unlock errors were caused by Qwest.[15]

For each 760 error code, AT&T must contact Qwest and wait for a response. Typically, AT&T has had to wait weeks for an initial response from Qwest and the resolution process has typically taken months. AT&T must research each number, which takes about ten minutes per number. The fact is that AT&T continues to receive approximately 100 orders with unlock problems every week in Arizona, with a majority of those errors caused by Qwest.[16]

As mentioned earlier, AT&T has had problems with Qwest's failing to unlock the 911 database for some time. In the past year, AT&T has worked at least 1,142 incidents of delayed unlocks (more than 14 days) in Arizona that AT&T was able to attribute to Qwest. In addition, AT&T has had at least 64 repeat unlocks.[17] In the case of repeat unlock problems, AT&T receives a 760 reject from Intrado and works with Qwest to fix the problem. Qwest then notifies AT&T that it has unlocked the number, but when AT&T attempts to update the database, it receives a reject message. These repeat problems further delay the unlocking of the 911 record and cause AT&T to waste a great deal time and resources.[18]

The figures contained in the Wilson Affidavit confirm that the 911 database updating problem is severe. The exhibits annexed to the Wilson Affidavit provide details

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[13] Wilson Aff. ¶ 9.
[14] Wilson Aff. ¶¶ 9-10.
[15] Wilson Aff. ¶ 10.
[16] Wilson Aff. ¶ 13.
[17] Wilson Aff. ¶ 8.
[18] *Id.*

for more than 250 currently locked numbers (although at this time AT&T cannot say precisely how many are attributable to Qwest) and for 1142 numbers that Qwest failed to unlock during 2001. Qwest's claims that this problem is minor and has been corrected are simply inconsistent with the facts. At the very least, the Commission should require Qwest to explain the discrepancies in its data with the data annexed to the Wilson Affidavit.

II. Qwest has failed to identify the cause of the 911 database updating problem

Qwest contends that it has corrected the 911 database updating problem with a new process that would allow Intrado to clean up the unlock problems that Qwest is creating.[19] According to Qwest, Intrado has "agreed" to effect a solution which would require it to query the NPAC database[20] each time there is an unlock conflict. By checking the NPAC database, Intrado would be able to determine if the number had been ported to the requesting party. To do this, Intrado would need to create a list of potential unlock rejects and then query each number against the NPAC database. In theory, this could be successful. There are, however, several serious problems with this "solution." First, it does nothing to solve the real problem, which is Qwest's failure to send the unlock message in a timely manner. Instead, it simply relieves Qwest of that burden. The solution also ignores that it is Qwest that has an obligation to provide access to 911 service, including nondiscriminatory access to the 911 database. Qwest's failure to properly send the unlock message in a timely fashion is a breach of that obligation.

Second, Intrado has no legal obligation to perform this function under the interconnection agreements of CLECs in Arizona, under the SGAT, under FCC

[19] Qwest's Verified Response to AT&T's Motion to Reopen and Supplement the Record on Checklist Item 7 (911), pages 7-9.

provisions, or under the Act. Intrado is not a party to any of the interconnection agreements between Qwest and the CLECs. Intrado is not a party to the SGAT. Finally, Intrado is not bound by any of the requirements set forth in the Act and implementing FCC rules and orders. The obligation runs to Qwest. CLECs would have little or no recourse if Intrado decided to discontinue performing NPAC queries or failed to perform them accurately or in a timely manner.

Third, the process Qwest describes is highly manual and adds a delay that Qwest does not experience when it updates the 911 database for its retail customers.[21] Fourth, the solution fails to address one of AT&T's most significant concerns: notification of the CLEC that the unlock has occurred.[22] AT&T depends on often slow and unreliable communication from Qwest that numbers have been unlocked, after the 14 day interval has elapsed. Qwest's proposed "solution" does not solve this problem.

Moreover, Qwest's proposed method of cleaning up unlock problems has not been tested. Given that the process is a manual one and that there can be hundreds of mistakes on a daily basis, it is imperative that Qwest and Intrado verify the viability of the new process.[23]

III. The Database PID Metrics Are Inaccurate, Incomplete And Fail To Capture Qwest's Poor Performance In Unlocking the 911 Database.

There are two PIDs that should capture Qwest's performance in unlocking the 911 database for LNP migrations: PID DB-1A, "Time To Update Databases" and PID DB-2, "Accurate Database Updates."[24] The results for these PIDs in Arizona make it clear,

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[20] The Number Portability Administration Center ("NPAC") database is a centralized database that records all numbers that have been ported from one carrier to another. This database is considered to be the database of record in determining which carrier "owns" a particular number.

[21] Wilson Aff. ¶ 15.

[22] Wilson Aff. ¶¶ 16.

[23] Wilson Aff. ¶ 17.

[24] Wilson Aff. ¶ 18.

however, that they are not capturing accurately Qwest's poor performance in failing to unlock the 911 database in a timely manner. The results for PIDs DB-1 and DB-2 do not reflect the many delays in processing 911 unlocks, including those lasting three months and longer, nor do they reflect the high number of 755 and 760 error code messages Intrado is sending AT&T.[25]

It appears that, through its use of terminology in the definition of DB-1A, Qwest may only be evaluating its retail results and its performance for CLECs ordering resold services.[26] This effectively eliminates the results for facilities-based CLECs, such as AT&T. If this is the case, none of AT&T's unlock problems is being measured and reported under these PIDs. In an affidavit filed by a consultant for the Department of Commerce in Minnesota, the consultant notes that Qwest is not measuring the complete process for 911 database updates. Ms. Murray states:

> Qwest's notion of "parity by design" drives OSS measurements that provide no information concerning the "unlocking" of E911 numbers. Even if Qwest failed to "unlock" migrating numbers in the E911 database 100% of the time, which would result in 100% fallout for competitors, the PID data it has presented concerning the E911 database would not reveal that competition-inhibiting fact. Thus, Qwest's presentation does not provide the Commission with the evidence necessary to determine whether Qwest's processing of E911 "unlock" records is in fact disadvantaging competitors."[27]

Similarly, it appears that Qwest has excluded the 911 database from PID DB-2. The purpose of the DB-2 measurement as described in the PID is to "evaluate the accuracy of database updates completed without errors in the reporting period." The current DB-2 measurement does not have a component that measures 911 database

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[25] Wilson Aff. ¶ 18.

[26] Wilson Aff. ¶ 18.

[27] Affidavit of Terry L. Murray on behalf of the Minnesota Department of Commerce, Before the State of Minnesota Office of Administrative Hearings for the Minnesota Public Utilities Commission, PUC Docket No. P-421/CI-01-1370, OAH Docket No. X-2500-14485-2 paragraph 35.

accuracy.[28] DB-2 must be amended to include a new measure that will capture the number of 911 error messages that Intrado sends to CLECs as the result of Qwest's failure to unlock the database. AT&T will propose these changes to the ROC and Arizona TAGs.

Qwest has argued against the need for modifying these PIDs because its processes for E911 database updates are "Parity by Design." Given the new information on the delays and errors in 911 database updates that Qwest is causing, this is clearly not always the case.[29] Although there may be parity by design for CLECs using resale, there is no parity for facilities based CLECs. By failing to send an unlock message, Qwest can dramatically delay the CLEC's ability to update the 911 database. Even though facilities based CLECs send their database changes directly to Intrado, Qwest's transmission of the unlock message to Intrado is a critical part of the process. When Qwest's unlock message is not sent in a timely manner, Intrado will not accept the CLEC database change. Given that the CLEC is dependent on Qwest's sending the unlock message, there can be no parity by design. Only when both PIDs, DB-1A and DB-2 are adjusted to capture Qwest's 911 database performance will the Commission have an accurate understanding on a monthly basis of whether Qwest is providing nondiscriminatory access to 911.[30]

[28] Wilson Aff. ¶ 18.
[29] Wilson Aff. ¶ 18.
[30] Wilson Aff. ¶ 18.

CONCLUSION

For all the foregoing reasons, the Commission should grant AT&T's Motion to Reopen and Supplement the Record and review Qwest's compliance with checklist item number 7.

Dated this 4th day of March 2002.

AT&T COMMUNICATIONS OF THE MOUNTAIN STATES, INC., AND TCG PHOENIX

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BEFORE THE ARIZONA CORPORATION COMMISSION

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Chairman
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Commissioner
MARC SPITZER
Commissioner

IN THE MATTER OF U S WEST COMMUNICATIONS, INC.'S COMPLIANCE WITH § 271 OF THE TELECOMMUNICATIONS ACT OF 1996	)	**Docket No. T-00000A-97-0238**

AFFIDAVIT OF KENNETH L. WILSON IN SUPPORT OF AT&T'S REPLY ON ITS MOTION TO REOPEN AND SUPPLEMENT THE RECORD ON QWEST'S COMPLIANCE WITH CHECKLIST ITEM NUMBER 7 OF SECTION 271 OF THE TELECOMMUNICATIONS ACT OF 1996

INTRODUCTION AND QUALIFICATIONS

1. My name is Kenneth L. Wilson. I filed an Affidavit, dated February 8, 2002, in support of AT&T's Motion To Reopen And Supplement The Record On Qwest's Compliance With Checklist Item 7 Of Section 271 Of The Telecommunications Act of 1996 ("AT&T's Motion"). In that Affidavit I set forth my background and qualifications. I note, however, that although I indicated my curriculum vitae was annexed to that affidavit, it was not included in the filing. Therefore, it is annexed hereto as Exhibit A.

PURPOSE OF AFFIDAVIT

2. In its Motion, AT&T described a serious problem updating the 911 database for new customers that have migrated to AT&T using local number portability ("LNP"). Specifically, as I explained in my Affidavit and AT&T explained in its brief, when a customer migrates to AT&T, the customer's former carrier must send a message to the manager of Qwest's 911 database to "unlock" the customer's telephone number in the 911 database. National standards require Qwest to send the message that will unlock the 911 record on the day the number is ported from Qwest to AT&T. When Intrado, the 911 database manager, receives this message, it unlocks the number which allows the customer's new carrier to claim ownership of the number and to update any information associated with that number. AT&T has been experiencing a large number of reject messages when it attempts to update the database for new LNP customers. AT&T discovered that the majority of these reject messages was the result of Qwest's having failed to send an unlock message to Intrado.

3. The danger in delaying AT&T's ability to unlock the database lies in the 911 operator's having incorrect address information for the customer. Thus, when a customer calls 911, the operator could send emergency assistance to the wrong location even though the operator sees what is supposed to be the caller's correct location on the screen.

4. In its Response to AT&T's Motion, Qwest acknowledged the problem, but disputed the scope of the problem. Qwest claimed that, according to Intrado, AT&T currently had only nine locked numbers in Arizona. Qwest also described a fix that it was implementing.

5. The purpose of my affidavit is to provide additional data about the large scope of the 911 problem attributable to Qwest, to correct certain aspects of my original affidavit and to explain why the fix that Qwest has proposed is inadequate. In addition, I also explain why the Performance Indicator Definitions ("PID") must be corrected to capture the errors associated with Qwest's failure to unlock the 911 database in a timely manner.

THE SCOPE OF THE 911 PROBLEM IS FAR GREATER THAN QWEST WOULD HAVE THIS COMMISSION BELIEVE.

6. After reviewing Qwest's response to AT&T's Motion and my first Affidavit, I undertook a more detailed analysis of AT&T's data related to the 911 problem. I discovered several important facts. When AT&T sends a message to update an LNP customer's data in the 911 database, but the number is locked by another carrier, Intrado returns a "755" error code. This is the error code that AT&T will continue to receive every time it attempts to update that customer's information on a locked number for the first fourteen days after the number has been ported (*i.e.*, the migration occurred).

When a number remains locked for more than fourteen days, the error code that Intrado returns changes to a 760.[1]

7. As I explained in my February 8 affidavit, AT&T and Qwest undertook a major effort in November of 2001 to unlock numbers in the 911 database for AT&T customers that had migrated from Qwest. These were numbers that Qwest had failed to unlock. Annexed hereto as Exhibit D is a list of the numbers that were unlocked mostly as a result of the November effort. This list, however, consists only of numbers for which AT&T had received a 760 error code. In other words, Qwest had failed to unlock all of these numbers for more than 14 days. In total, there are 1,142 unique numbers on this list.

8. There are an additional 64 unlock problems bringing the total associated with these numbers to 1,206. The additional 64 entries were "repeat" unlock problems. A repeat problem occurs when Qwest erroneously informs AT&T that it has unlocked the number, AT&T records the number as unlocked and then attempts to update the 911 database. Intrado responds with a 760 error code because Qwest, in fact, has not unlocked the number. AT&T then has to re-investigate why it is receiving this error code from Intrado even though Qwest states that it cleared the number. These repeat problems further delay the unlocking of the 911 record and cause AT&T a great deal of wasted time and resources. AT&T is regularly experiencing repeat unlock problems that are sometimes associated with the failure of Qwest to correctly process an LNP order.

9. In addition to the 1,142 numbers identified in Exhibit D hereto, my investigation leads me to conclude that there were LNP numbers for which AT&T

[1] In my February 8, 2002 Affidavit, I stated that Intrado sends a second reject message when the number has been locked for more than 30 days. I now understand that Qwest changes the error code after 14 days,

received 760 error codes throughout the past year, but for which AT&T did not keep a record of the problem. I reach this conclusion because data indicate that problems with all but a handful of the 1,142 numbers were resolved in or after November 2001. AT&T personnel have informed me that they resolved additional 760 error codes attributable to Qwest throughout 2001, not just in or after November. Moreover, as of February 25, 2002, AT&T had a total of 264 numbers that had not been unlocked in Arizona, 156 for less than 14 days and 108 for over 14 days. In Exhibits B and C annexed hereto, I have listed the numbers for which, as of February 25, AT&T has pending 755 and 760 error codes, respectively. As Exhibit B shows, the current number of pending unlocks in Arizona for AT&T where Intrado has sent the "755" error code is 156. Some of these will get cleared within the 14 day period for the same reasons that Qwest illustrated in their comments. One example is where AT&T sends the first request to Intrado to change the data a day before Qwest sends the unlock message. However, as Exhibit C shows, AT&T has 108 numbers in Arizona where Intrado has not received an unlock message for over 14 days. Thus, many unlock problems are not solved as easily as Qwest suggests. AT&T has not fully investigated either the 156 "755" error codes or the 108 "760" error codes.

10. My analysis further reveals that at least for 760 error codes, in excess of 99% of the reject messages are attributable to Qwest's failure to unlock the database. Thus, if we assume that 106 of the 108 pending 760 error codes are attributable to Qwest and add those to the 1,142 cleared numbers, AT&T has experienced more than 1,248 rejects on 911 updates – all of which are for numbers that remained locked more than 14 days. It is important to note that AT&T received additional 760 error codes that it does not have a record of during 2001 and that it received 755 error codes throughout the

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not 30.

year as well (many of which did not become 760 error codes and thus should be counted separately). The number of 911 problems AT&T has experienced on unique numbers in Arizona alone is therefore well in excess of 1,248.

11. In my February 8 affidavit, I stated that during 2001 AT&T had received reject messages from Intrado for more than 1700 numbers in Arizona. Although I still believe this number to be true based on the above analysis, my further study of AT&T data reveals that some of the numbers on which I based that original statement were duplicates. What I now realize is that AT&T does not appear to have maintained historical records of any number for which it has received a 755 error code. Moreover, AT&T does not appear to have maintained complete records of numbers for which it received 760 error codes before the joint clean up effort in November 2001. What AT&T has, however, is a current list of pending requests. The list is a "snapshot" in time of those numbers for which 755 or 760 error codes exist.

12. In my February 8 Affidavit, I also stated that almost 1,000 of the 1,700 numbers were locked for more than three or four months. I can say with certainty, as evidenced in Exhibit D, that at least 750 numbers were locked for more than three or four months. In all likelihood, there are many others that were locked for more than three or four months, but for which AT&T does not have records.

13. Although having a better understanding of AT&T's data and the repeat unlock problems has led me to more conservative figures than those set forth in my February 8 Affidavit, I continue to believe that the figures in my February 8 Affidavit are correct, but for different reasons. More importantly, both sets of figures show a serious problem of great magnitude. Even using the more conservative figures set forth herein,

AT&T continues to have 108 numbers locked for more than 14 days as of February 25, 2002 and has experienced at least 1,142 "760" error codes on unique numbers in Arizona. The fact is that AT&T continues to receive approximately 100 orders with unlock problems every week in Arizona, with a majority of those errors caused by Qwest.

THE ALLEGED FIX THAT QWEST STATES IT HAS IMPLEMENTED FAILS TO RESOLVE THE PROBLEM AND IS INEFFECTIVE

14. Qwest describes a new process that would allow Intrado to clean up the unlock problems that Qwest is creating.[2] This "solution" would have Intrado query each number where there was an unlock conflict with the NPAC database[3] to see if the number had been ported to the requesting party. To do this, Intrado would need to create a list of potential unlock rejects and then query each number against the NPAC database. There are serious problems with this "solution." First, it does not determine or correct the root cause of the problem, *i.e.*, understanding why Qwest is failing to send the unlock message at the appropriate time.

15. Second, the process described by Qwest would require additional time, adding to delays in the update of the 911 database that Qwest does not experience when it updates the 911 database for its retail customers. The Intrado based "solution" is manual ***BEGIN CONFIDENTIAL***:

END CONFIDENTIAL[4]

[2] Qwest's Verified Response to AT&T's Motion to Reopen and Supplement the Record on Checklist Item 7 (911), pages 7-9.

[3] The Number Portability Administration Center ("NPAC") database is a centralized database that records all numbers that have been ported from one carrier to another. This database is considered to be the database of record in determining which carrier "owns" a particular number.

[4] Confidential Exhibit 5 to Qwest's Verified Response to AT&T's Motion to Reopen and Supplement the Record on Checklist Item 7 (911).

The "solution" requires numerous manual steps ***BEGIN CONFIDENTIAL***:

END CONFIDENTIAL[5]

16. One specific step has been left out, which is the notification of the CLEC that the problem has been fixed. One of the worst aspects of the 911 unlock problem for AT&T is that AT&T is kept in the dark as to when or if Qwest has fixed the problem. AT&T must depend on slow and unreliable communication from Qwest that numbers have been unlocked, after months in limbo. The Qwest "solution" does not solve that problem. It is a post hoc, band-aid approach that will result in significant additional delays.

17. In addition to these considerations, the proposed method of cleaning up unlock problems through manual intervention has not been tested as a practical method for dealing with hundreds of mistakes on a daily basis. Intrado must have dedicated staff, clear processes and adequate support necessary to keep current with the level of problems Qwest creates. No 3rd party testing has been done on the proposed process and Qwest has not offered to undertake such testing.

THE CURRENT REPORTING OF PID METRICS ARE INCOMPLETE AND INACCURATE WITH RESPECT TO THE 911 DATABASE.

18. The results Qwest presents on the metrics DB-1 "Time To Update Databases" and DB-2 "Accurate Database Updates" for Arizona reveal that, based on

[5] Id.

AT&T's experience, the many errors Qwest is causing are not being captured. The three month long delays in processing 911 unlocks and the number of messages that are returned from Intrado with errors are not being recorded in DB-1 or DB-2. It now appears that, through its use of terminology in the definition of DB-1A, Qwest may only be comparing its retail results to its performance for CLECs ordering resold services. This effectively eliminates the results for facilities based CLECs, such as AT&T. If this is the case, none of AT&T's unlock problems is being measured and reported under this PID. Not only does this provide an inaccurate evaluation of Qwest's performance, but it allows Qwest to avoid incentive payments for their very poor performance in this area.

19. It is clear that Qwest is currently not meeting its obligation to provide access to the 911 database in a non-discriminatory manner. I became aware of the information that proves this statement in the past few months. Both the fact of the problem and the wide discrepancy in the size of the problem as reported by AT&T and Qwest demand that the Arizona Commission reopen checklist item 7 to fully explore the issues. In addition, Qwest's new "solution" is nothing more than a paper promise. Qwest's solution is untested and Qwest has not, and cannot at this point, provide any assurances that this solution will, in fact, correct the unlock problems that AT&T has encountered. Until Qwest's approved interconnection agreements reflect: 1) the appropriate contractual obligations that the new solution is actually implemented; 2) DB-1A and DB-2 are revised or new PIDs are adopted; and 3) there is sufficient CLEC

experience to demonstrate that the solution corrects the problem, Qwest cannot satisfy Checklist Item 7.

FURTHER AFFIANT SAYETH NOT.

Kenneth L Wilson

COUNTY OF BOULDER

STATE OF COLORADO

Subscribed and sworn to before me this 4th day of March, 2002.

SEAL

Notary Public

my Commission 8/26/04

CURRICULUM VITAE

Kenneth L. Wilson, Boulder Telecommunications Consultants, LLC., 970 11th Street, Boulder, CO 80302. (303) 442-1296. email: ken.wilson@bouldertel.com

Current Position

1998-Present Senior Consultant, Boulder Telecommunications Consultants, LLC.

Past Positions

1995-1998 AT&T Technical Negotiations Director, Local Service Organization Western Region – Technical leader of negotiations and witnessing team responsible for all aspects of AT&T's contracts in 14 states with US WEST. Led technical planning for local infrastructure and Operations Support Systems "OSS" interfaces.

1994-1995 AT&T Bell Labs local infrastructure development and business analysis – technical lead for team evaluating local infrastructure alternatives and OSS.

1992-1994 Bell Labs Technical Director Network Deployment and Asset Management – key team leader on AT&T project to optimize network infrastructure by changing engineering rules and OSS processes.

1988-1992 Bell Labs MTS Supervisor responsible for network design and OSS performance of the FTS2000 network. Network performance planning for new business customer features. Competitive testing and analysis of multiple vendor networks.

1984-1987 Bell Labs MTS and MTS Supervisor, Cellular Telephone Development. Responsible for systems requirements and systems testing of new cellular telephones.

1980-1984 Bell Labs MTS responsible for 4ESS feature and architecture planning.

1977-1980 Software, hardware and manufacturing engineering in two small companies.

1972-1977 Teaching Assistant, University of Illinois Department of Electrical Engineering.

Education

ABD for Ph.D. in Electrical Engineering, University of Illinois, 1976
MS in Electrical Engineering, University of Illinois, 1974
BS in Electrical Engineering, Oklahoma State University, 1972

A. WRITTEN TESTIMONY, AFFIDAVITS AND REPORTS

Date	State	Docket	Filed By	Description
2/11/1998	IA	AIA-96-1	AT&T	Direct Testimony - Arbitration Remand - USWC
2/12/1998	OR	UT138	AT&T	Reply Testimony UM351 Compliance Tariffs - USWC
2/12/1998	OR	UT139	AT&T	Reply Testimony UM351 Compliance Tariffs - GTE
3/9/1998	IA	AIA-96-1	AT&T	Direct Answer Testimony - Arbitration Remand - USWC
3/13/1998	NM	96-411-TC	AT&T	Direct Testimony - Arbitration AT&T/USWC
3/23/1998	IA	AIA-96-1	AT&T	Rebuttal Testimony - Arbitration Remand - USWC
4/8/1998	CO	96S-331T	AT&T	Testimony - Arbitration - Cost Issues - USWC
5/26/1998	AZ	T-0000A-97-238	AT&T	Reply Testimony - Sect. 271 Telecom Act
6/16/1998	MT	D97.5.87	AT&T	Direct & Rebuttal Testimony - Sect. 271 Telecom Act
7/27/98	NM	97-106-TC	AT&T	Direct & Rebuttal Testimony - Interconnection - Sect. 271
7/27/1998	NM	97-106-TC	AT&T	Direct & Rebuttal Testimony - Signaling - Sect. 271
8/7/1998	NE	C-1830	AT&T	Direct & Rebuttal Testimony - Signaling - Sect. 271
8/7/1998	NE	C-1830	AT&T	Direct & Rebuttal Testimony - Interconnection - Sect. 271
9/8/1998	NM	97-106-TC	AT&T	Reply Testimony - Sect. 271 Telecom Act
9/8/1998	NM	97-106-TC	AT&T	Reply Testimony (prop version) - Sect. 271 Telecom Act
11/6/1998	MT	D97.5.87	AT&T	Supplemental Rebuttal Testimony - Sect. 271 Telecom Act
11/13/1998	WA	UT-960369 et al.	AT&T	Sup. Responsive Testimony Arbitration Cost Case
12/1/1998	WA	C97-1073Z	ELI	Expert Opinion - ELI complaint against US WEST for violation of the Sherman Act
2/1/99	WA	C97-1073Z	ELI	Expert Report - ELI complaint against US WEST for violation of the Sherman Act
10/22/99	CA	CA97-2015	CalTech	Expert Report – CalTech complaint against Pacific Tel for violation of the Sherman Act
12/99	CA	CA97-2015	CalTech	Supplement to Expert Report - CalTech complaint against Pacific Tel for violation of the Sherman Act
12/17/99	WA	UT-991292	AT&T	Direct and Rebuttal – Access complaint against US WEST
1/00	CA	CA97-2015	CalTech	Declaration - CalTech complaint against Pacific Tel for violation of the Sherman Act

1/00	AZ	USW application for Section 271 relief	AT&T	Comments on 271 Checklist items 3, 7, 8, 9, 10, 12, and 13
4/00	CO	USW application for Section 271 relief	AT&T	Comments on 271 Checklist items 3, 7, 8, 9, 10, 12, and 13
5/00	WA	USW application for Section 271 relief	AT&T	Testimony on 271 Checklist Items 3, 7, 8, 9, 10, 12, and 13
6/00	CO	Section 271 PUC Workshop,	AT&T	Affidavit on checklist items 3, 7, 8, 9, 10, 12, and 13
7/00	WA	Section 271 PUC Workshop,	AT&T	Affidavit on checklist items 3, 7, 8, 9, 10, 12, and 13
7/00	VA	Circuit Court, Fairfax County, Chancery # 166950	Hogan Hartson	Initial Expert Report in Trade Secret Case involving High Speed Access and Internet.
7/00	VA	Circuit Court, Fairfax County, Chancery # 166950	Hogan Hartson	Final Expert Report in Trade Secret Case involving High Speed Access and Internet. This report was not filed but was produced in discovery
8/00	CO	Section 271 PUC Workshop, checklist	AT&T	Affidavit on checklist items 1, 14
8/00	AZ	Section 271 PUC Workshop,	AT&T	Affidavit on checklist items 1, 14
9/00	AZ	Section 271 PUC Workshop,	AT&T	Affidavit on checklist items 1, 14
9/00	CO	Section 271 PUC Workshop, checklist items 1, 14 (follow-up)	AT&T	Affidavit on checklist items 1, 14
10/00	UT, IA, etc.	Section 271 PUC Workshop,	AT&T	Affidavit on checklist items 1, 11, 14
10/00	AZ	Section 271 PUC Workshop,	AT&T	Affidavit on checklist items 2, 5, 6
10/00	OR	Section 271 PUC Workshop,	AT&T	Affidavit on checklist items 1, 11, 14
11/00	CO	Section 271 PUC Workshop,	AT&T	Affidavit on emerging services checklist items (dark fiber, DSL, subloop unbundling)
11/00	WA	Section 271 PUC Workshop,	AT&T	Affidavit on checklist items 1, 11, 14
11/00	AZ	Section 271 PUC Workshop	AT&T	Affidavit on Unbundled loops and Number Portability
12/00	CO	Section 271 PUC Workshop	AT&T	Affidavit on Packet Switching, Line Sharing, DSL, Dark Fiber and SubLoop Unbundling

12/00	WA	Antitrust Case against US WEST	Metronet	Plaintiffs Report on Telecommunications issues
01/01	CO	Section 271 PUC Workshop	AT&T	Affidavit on Unbundled Switching, Unbundled Transport, Combinations, UNE-P and general UNE issues
02/01	UT, IA, etc.	Section 271 PUC Workshop	AT&T	Affidavit on Unbundled Switching, Unbundled Transport, Combinations, UNE-P and general UNE issues
02/01	WA	Section 271 PUC Workshop	AT&T	Affidavit on Unbundled Switching, Unbundled Transport, Combinations, UNE-P and general UNE issues
03/01	OR	Section 271 PUC Workshop	AT&T	Affidavit on Unbundled Switching, Unbundled Transport, Combinations, UNE-P and general UNE issues
03/01	WA	Antitrust Case against US WEST	Metronet	Declaration in Support of Opposition to US WEST Motion for Summary Judgement
03/01	UT, IA, etc	Section 271 PUC Workshop	AT&T	Comments on Unbundled Loops, Line Splitting and Network Interface Devices
03/01	CO	Section 271 PUC Workshop	AT&T	Comments on Unbundled Loops, Line Splitting and Network Interface Devices
03/01	AZ	Section 271 PUC Workshop	AT&T	Comments on Unbundled Loops, Line Splitting and Network Interface Devices
04/01	DC	Class Action, DC Superior Court, 01CA000405	Cohen, Milstein	Affidavit for Plaintiff on technical issues in DSL case against Verizon, in response to motion to dismiss.
05/01	WA	Section 271 PUC Workshop	AT&T	Comments on Unbundled Loops, Emerging Services, Subloop Unbundling
05/01	OR	Section 271 PUC Workshop	AT&T	Comments on Unbundled Loops, Emerging Services, Subloop Unbundling
05/01	GA	Section 271 PUC Hearing	AT&T	Affidavit on Interconnection Trunking and Local Number Portability
05/01	LA	Section 271 PUC Hearing	AT&T	Affidavit on Interconnection Trunking and Local Number Portability
06/01	KY	Section 271 PUC Hearing	AT&T	Affidavit on Interconnection Trunking and Local Number Portability
07/01	AL	Section 271 PUC Hearing	AT&T	Testimony on Interconnection Trunking and Local Number Portability
08/01	CO	Civil Action 01-S-0025	City of Louisville	Defendant's Report on Technical Issues. Involving placement of Microwave Towers
10/01	AZ	Affidavit in Docket T-00000A-97-0238	AT&T	Affidavit regarding the redesignation of Interoffice Facilities (IOF) as loop facilities
12/01	AZ	Section 271 PUC Workshop	AT&T	Comments on Qwest's Stand Alone Test Environment OSS interface simulator

B. LIVE TESTIMONY AND DEPOSITIONS

Date	State	Case
2/97	Arizona	Arbitration Hearings between AT&T and U S WEST, representing AT&T.
6/97-12/97	Arizona	Arbitration Hearings between AT&T and U S WEST, representing AT&T. Total of approximately 15 days.
10/17/97	Iowa	Second Motion to compel U S WEST to perform under AT&T Interconnection Agreement, representing AT&T.
4/98	Colorado	96S-331T U S WEST Arbitration Cost Case, representing AT&T.
3/98	NM	96-441-TC U S WEST Arbitration Hearing, representing AT&T.
2/98	OR	UM 351 U S WEST Compliance Tariffs, representing AT&T
3/98	IA	Arbitration Remand between AT&T and U S WEST, representing AT&T.
11/98	WA	UT 960369 U S WEST Arbitration cost case, representing AT&T.
12/98	WA	Deposition – ELI Complaint under the Sherman Act against U S WEST
2/99	WA	Hearing – ELI Complaint under the Sherman Act against U S WEST
12/99	CA	Deposition – CalTech Complaint under the Sherman Act against Pacific Bell
12/99	CO	Hearing – AT&T Complaint against U S WEST for Access Service Quality
1/00	MN	Deposition – AT&T Complaint against U S WEST for Access Service Quality in Minnesota
2/00	WA	Hearing – AT&T Complaint against U S WEST for Access Service Quality
1/00	AZ	Section 271 Workshop, representing AT&T on checklist items 3, 7, 8, 9, 10, 12, and 13
2/00	MN	Hearing – AT&T Complaint against U S WEST for Access Service Quality
3/00	AZ	Section 271 PUC Workshop, representing AT&T on checklist items 3, 7, 8, 9, 10, 12, and 13
6/00	CO	Section 271 PUC Workshop, representing AT&T on checklist items 3, 7, 8, 9, 10, 12, and 13
6/00	WA	Section 271 PUC Workshop, representing AT&T on checklist items 3, 7, 8, 9, 10, 12, and 13
6/00	CO	Section 271 PUC Workshop, representing AT&T on checklist items 3, 7, 8, 9, 10, 12, and 13 (follow-up)
7/00	WA	Section 271 PUC Workshop, representing AT&T on

		checklist items 3, 7, 8, 9, 10, 12, and 13 (follow-up)
8/00	CO	Section 271 PUC Workshop, representing AT&T on checklist items 1, 14
8/00	AZ	Section 271 PUC Workshop, representing AT&T on checklist items 1, 14
9/00	AZ	Section 271 PUC Workshop, representing AT&T on checklist items 1, 14 (follow-up)
9/00	CO	Section 271 PUC Workshop, representing AT&T on checklist items 1, 14 (follow-up)
10/00	UT, IA, etc.	Section 271 PUC Workshop, representing AT&T on checklist items 1, 11, 14 (6 State consolidated proceeding)
10/00	AZ	Section 271 PUC Workshop, representing AT&T on checklist items 2, 5, 6
10/00	OR	Section 271 PUC Workshop, representing AT&T on checklist items 1, 11, 14
11/00	CO	Section 271 PUC Workshop, representing AT&T on emerging services checklist items (dark fiber, DSL, subloop unbundling)
11/00	WA	Section 271 PUC Workshop, representing AT&T on checklist items 1, 11, 14
11/00	CA	Antitrust trial CalTech vs. Pacific Bell in Federal Court.
11/00	WA	Section 271 PUC Workshop, representing AT&T on checklist items 1, 11, 14 -
12/00	CO	Section 271 PUC Workshop, representing AT&T on checklist items for Dark Fiber, DSL, Packet Switching and Subloop Unbundling
12/00	UT, IA, etc.	Section 271 PUC Workshop, representing AT&T on checklist items for Interconnection and Collocation (7 State consolidated proceeding)
01/01	WA	Section 271 PUC Workshop, representing AT&T on checklist items for Interconnection and Collocation
01/01	UT, IA, etc.	Section 271 PUC Workshop, representing AT&T on checklist items for Collocation, Dark Fiber, DSL, Packet Switching (7 State consolidated proceeding)
01/01	CO	Section 271 PUC Workshop, representing AT&T on checklist items for Interconnection and Collocation
01/01	AZ	Section 271 PUC Workshop, representing AT&T on checklist items for Dark Fiber, DSL, Packet Switching and Subloop Unbundling
02/01	OR	Section 271 PUC Workshop, representing AT&T on checklist items for Interconnection and Collocation
02/01	AZ	Section 271 PUC Workshop, representing AT&T on checklist items for Interconnection and Collocation
02/01	CO	Section 271 PUC Workshop, representing AT&T on checklist items for Unbundled Platform, UNE Switching, Transport and Combinations

02/01	UT, IA, etc.	Section 271 PUC Workshop, representing AT&T on checklist items for DSL, Packet Switching and Subloop elements (7 State consolidated proceeding)
03/01	AZ	Section 271 PUC Workshop, representing AT&T on checklist items for UNE Loops, Line Splitting and Number Portability
03/01	WA	Section 271 PUC Workshop, representing AT&T on checklist items for Unbundled Platform, UNE Switching, Transport and Combinations
03/01	CO	Section 271 PUC Workshop, representing AT&T on checklist items for Unbundled Platform, UNE Switching, Transport and Combinations
03/01	UT, IA, etc.	Section 271 PUC Workshop, representing AT&T on checklist items for Unbundled Platform, UNE Switching, Transport and Combinations (7 State consolidated proceeding)
04/01	AZ	Section 271 PUC Workshop, representing AT&T on checklist items for Unbundled Platform, UNE Switching, Transport and Combinations
04/01	CO	Section 271 PUC Workshop, representing AT&T on checklist items for Loops, Number Portability and Line Splitting.
04/01	WA	Section 271 PUC Workshop, representing AT&T on checklist items for Unbundled Platform, UNE Switching, Transport and Combinations
04/01	UT, IA, etc.	Section 271 PUC Workshop, representing AT&T on checklist items for Loops and Line Splitting. (7 State consolidated proceeding)
05/01	OR	Section 271 PUC Workshop, representing AT&T on checklist items for Unbundled Platform, UNE Switching, Transport and Combinations
05/01	AZ	Section 271 PUC Workshop, representing AT&T on checklist items for Loops, Number Portability and Line Splitting.
05/01	CO	Section 271 PUC Workshop, representing AT&T on checklist items for Loops, Number Portability and Line Splitting.
06/01	AL	Section 271 Hearing, representing AT&T on checklist items for Interconnection Trunks and Number Portability
07/01	WA	Section 271 PUC Workshop, representing AT&T on checklist items for Loops, DSL, Subloop and Line Splitting.
07/01	OR	Section 271 PUC Workshop, representing AT&T on checklist items for Loops, DSL, Subloop and Line Splitting.
07/01	WA	Section 271 PUC Workshop, representing AT&T on checklist items for Loops, DSL, Subloop and Line Splitting.
12/01	AZ	Section 271 PUC Workshop, representing AT&T in the

		evaluation of Qwest's OSS test environment.

Exhibit B

Confidential

Exhibit C

Confidential

Exhibit D

Confidential

CERTIFICATE OF SERVICE

I hereby certify that the original and 10 copies of the public version of **AT&T's Reply on Its Motion to Reopen and Supplement the Record on Checklist Item 7 (911),** Docket No. T-00000A-97-0238 were sent by overnight delivery on March 4, 2002 to:

Arizona Corporation Commission
Docket Control – Utilities Division
1200 West Washington Street
Phoenix, AZ 85007

and a true and correct copy was sent by overnight delivery on March 4, 2002 to:

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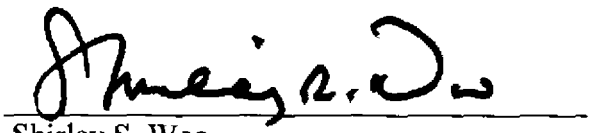

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